

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

**Plaintiff,
vs.**

CR. NO. 22-462 DHU

LATRICE THOMAS,

Defendant.

EMERGENCY MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant Latrice Thomas (“Ms. Thomas”), through his undersigned counsel, respectfully moves the Court to modify conditions of release previously set in this case on May 25, 2022. In support of this motion, Ms. Thomas states as follows:

On May 25, 2022, Ms. Thomas was released to the custody of the Hoffman House in Albuquerque, New Mexico. Ms. Thomas recently was awarded rental assistance to pay for her rent at her designated Hoffman House for the next six (6) months.

Since her release, Ms. Thomas has been compliant with her conditions of release. Her release conditions included GPS monitoring and supervision U.S. Pretrial Services. *See, Order Setting Conditions of Release, Doc. 33.* The Order signed by the Court also states that Ms. Thomas is to remain at Hoffman House until a bed space becomes available at La Pasada Halfway House.

As the Court may recall, Ms. Thomas suffers from a knee injury which requires regular medical therapy and treatment. She currently ambulates with the assistance of crutches. She is scheduled for knee surgery on September 2, 2022 at Rust Presbyterian Hospital in Rio Rancho,

New Mexico. The Hoffman House where she currently resides has made accommodations for Ms. Thomas' post-surgery recovery.

Considering the foregoing facts, Ms. Thomas respectfully requests that her conditions of release be modified to allow her to remain at her Hoffman House residence until all pending proceedings in this case are completed.

AUSA Jack Burkhead opposes this motion with the caveat that he does not oppose Ms. Thomas remaining at her Hoffman House residence until this motion is heard. U.S. Probation Officer Beatrice Manzanares opposes this motion.

WHEREFORE, Ms. Thomas respectfully moves this Court to modify her conditions of release as requested and to allow her to remain at the Hoffman House pending a ruling on this motion.

Respectfully Submitted:
ROMERO & WINDER, PC

By: /s/ Joe M. Romero, Jr.
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing to all counsel of record via the Court's CM/ECF electronic document and delivery system.

“Electronically Filed”
/s/ Joe M. Romero, Jr.
Attorney for Defendant